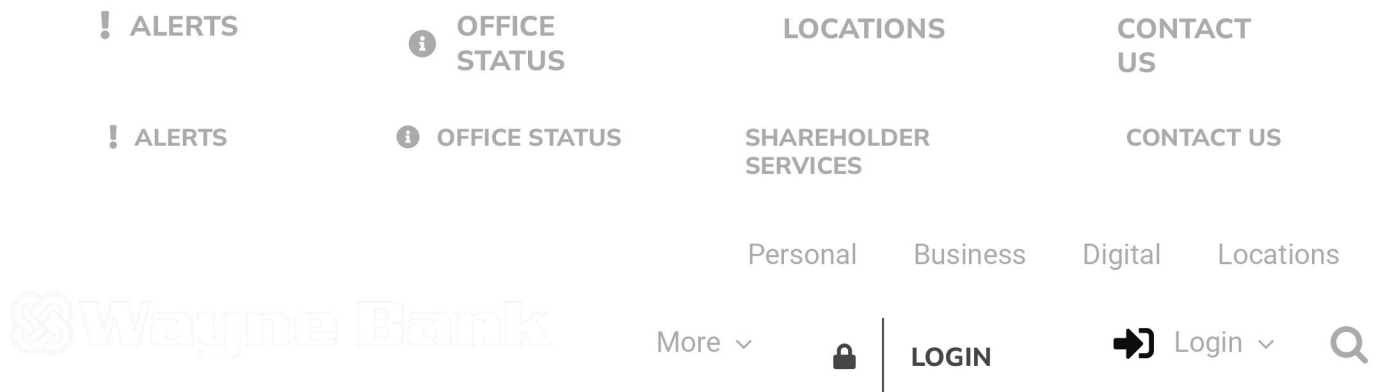


# **EXHIBIT C**



# Privacy Policy

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## Introduction:

Wayne Bank, a wholly owned subsidiary of Norwood Financial Corp, is grounded upon the belief that all customer relationships are based upon confidence and trust. It is a privilege to provide quality financial services, like Internet Banking, to our valued clients. While extending service, we must safeguard all customer information we have gathered. We recognize and intend to honor the right to privacy as an obligation and priority.

The bank's resources are strategically aligned to concurrently deliver customer satisfaction and confidentiality of personal information. For all services, the bank's board of directors mandates management to employ security methods and facilities designed to maximize privacy for all clients. Internet Banking services comply with this mandate by employing several effective measures. The following overview outlines the extent of these measures.

## Security Environment Overview:

Wayne Bank and its technical service providers work jointly to ensure all customer information associated with bank services is protected. Protecting

customer privacy is one of our top priorities. A link to Wayne Bank's current Privacy Notice is provided at the bottom of this web page. Customers will be notified thirty days in advance when the Bank's Privacy Policy is updated. Basic methods used to protect personal information within our website include the following:

1. Industry standard SSL encryption which protects customer information while it is being passed between bank systems and a client's browser.
2. The bank's processing center has very strict security with access to customer records limited to qualified staff only. The premises are continuously monitored; qualified personnel enter and exit via an electronically controlled locking system. All entrances and exits are recorded electronically.
3. Access to electronic data files requires multiple levels of authentication. All sensitive data, such as customer account numbers, remains encrypted at all times.
4. Bank employees and its service providers' employees are aware of all security policies, procedures and practices. They give a pledge, in writing, to abide by a strict code of conduct.
5. All external system access to the bank's internal network must go through computer firewalls. Firewalls also protect application systems and stored data. The firewalls are regularly tested by highly qualified third parties to verify their ability to shield customers' personal data against unauthorized access of any type.
6. The bank and its data services provider utilize intrusion detection systems to continuously monitor and report unauthorized data access attempts.

## Internal Business Practices:

Periodically, Wayne Bank contracts with outside vendors to obtain services or provide specialized products to our customers. In fulfilling their responsibilities, vendors may have access to private customer information, however, they are contractually bound to safeguard this data and comply with the regulations and policies governing the bank. The bank is committed to maximizing the privacy



of our clients; we consistently monitor and manage the activities of our service providers.

Wayne Bank has a secure data warehouse to store all Internet Banking access credentials in an encrypted format. A very limited number of authorized staff has access to the data storage warehouse. However, only customers have the ability to see the access credentials they have chosen and provided. This information is not accessible by bank employees.

To prevent easy compromise by unauthorized persons, the bank utilizes dual authentication security. The system requires all users to have two levels of identification including an image and phrase in addition to ID codes with passwords containing alpha and numeric characters. In the event an identification code or password is forgotten, the bank provides a self initiated process to reinstate secure access.

## **Information Customers Provide and How It's Used:**

When you visit our websites and utilize our online services, we may gather personal information from you to develop individualized Online Banking experiences. This could include information you provide to enroll or use a service such as your name, mailing and email address, phone numbers, account numbers, and your user name & password. This data also allows the Bank to understand customer preferences in order to present new products and services which are suitable to personal interests.

To monitor and support connectivity to our online services, we may gather additional information about your location, type of device, browser and IP address. Wayne Bank may send you marketing communications that we believe may be of interest to you and otherwise for advertising and sales purposes, whether online or through offline channels like Community Offices and direct marketing (for example electronic mail "email", mail, and phone). We may also periodically contact you to request participation in market surveys. However, we will never request customers to provide the private information which grants access to their accounts.



# Information Customers Do Not Directly Provide and How It's Used:

Wayne Bank, our service providers and/or our third-party partners may collect information you do not provide to us directly:

- Through or from your device or browser or cookies that have been placed on your device or internet browser at our Site or at other websites you have visited to learn more about your website visit and use of our online services. Certain information is collected by most browsers, such as your Media Access Control (MAC) address, computer type (Windows or Macintosh), screen resolution, operating system version, and interest browser type and version.
  - Internet Cookies– Cookies collect information about the website pages you view. When you visit a website, the site may place a cookie on your web browser so it can recognize your device in the future. If you return to that site later on, it can read that cookie to remember you from your last visit and keep track of you over time. Cookies can be used to customize your experience and can be helpful with fraud monitoring. Cookies allow us to collect information such as browser type, time spent on a website, pages visited, language preferences, and information about your relationships with us. Cookies also allow us to facilitate image changes, collect anonymous aggregate website traffic, provide certain discount, promotional and reward programs to you, and personalize our services to your needs. Our Sites do not require users to accept cookies, and you can set your browser to notify you when you receive a cookie, giving you the opportunity to decide whether or not to accept it. If you choose not to accept cookies, you may experience some reduction in functionality depending on which Site you are using.
- Using pixel tags, page tags, or similar technologies to gather data in order to learn more about your website visit and use of our online services. We may supplement the information we collect from you with information we receive about you from other sources.
  - Page Tags– A page tag is a tool that allows us to mark or categorize a page or groups of pages on our website. Page tags allow us to identify what our visitors are accessing on our website.



- Pixel Tags – (also known as web beacons and clear GIFs) may be used in connection with some Site pages and HTML-formatted email messages in order to, among other functions, track the actions of users and email recipients, measure the success of our marketing campaigns, and compile statistics about Site use and response rates.
- Using your IP address for purposes such as calculating Site usages levels, helping diagnose server problems, and administering the Site.
  - IP Address– An IP address is a unique set of numbers assigned to your network by your internet service provider. The number is logged by the websites you visit and may be used to identify your online activity. This information may also be used to monitor the frequency, as well as provide localized content and security. IP addresses allow information to be sent between devices on a network which contain information and make devices accessible for communication.
- Using geolocation and other location information transmitted by your device, if you have enabled location services on the device, and using behavioral biometrics relating to your use of device for identity verification, fraud avoidance, and security purposes.
- To access third party internet services using Online Banking, you may be required to provide additional information for use by the third party. We will use this information on your behalf only for accessing the services you personally select, in order to deliver to you the information you request.

## Use of Information for Advertising, Online Behavioral Advertising:

We may use personal information in connection with our online advertising activity. Online advertisements may be in the form of banner ads, splash ads, or other formats. These advertisements may appear on our Site, and we may contract with third party advertising companies to promote our products and services and serve related advertisements on websites and mobile applications that are owned or operated by parties not affiliated with us.

In order to better understand which of our products and services may be of interest to you and to tell you about those products and services, we may from time to time collect information about your online activities over time and across third party websites and online services. We also may engage third party

service providers to collect information about your online activities over time and across third party websites and online services when you use our Site. Serving advertisements based on a person's online activities over time and across third party websites and online services is generally known as "online behavioral advertising." Here are some tips and other important information regarding online behavioral advertising:

- If you are given an opportunity to opt out from online behavioral advertising and you make an opt-out election, then in order to maintain the opt-out election at our Site and at other websites that might serve behavioral advertisements on our behalf, your browser must be enabled to accept cookies. If you delete cookies, buy a new device, access our Site or other websites from a different device, login under a different screen name, or change web browsers, you will need to opt out again.
- You also may be able to avoid online behavioral advertising by disabling scripting in your browser. Please check the security settings in your browser to determine the status of scripting settings. However, please note that if you disable scripting, you may be unable to use certain features on a website. In other cases, the website may become inoperable, your experience may not be optimal, you may not be using the latest standards for safe and secure transactions, or you may not be allowed to access the site.
- Some browsers may provide a "do not track" or similar setting. Our Site does not respond to such settings. If you enable such a setting it will not prevent the collection of information about your online activities over time and across third party websites when you visit our Site.
- You should be aware that even if you exercise a choice not to receive targeted advertisements in connection with online behavioral advertising, your election does not necessarily stop the collection of information about your online activities over time and across third party websites and online services for purposes other than online behavioral advertising.
- You may still receive generic advertising (i.e., advertising that is not based on your online activities over time and across third party websites and online services) even if you opt out of online behavioral advertising, and opting out of online behavioral advertising may not result in the termination of advertising and promotions provided in connection with rewards programs we may offer.
- We may share personal information with third-party advertising companies with which we have contracted in order to support other targeted

advertising, promotional, and rewards programs that we offer. You may opt out of rewards programs we offer and the targeted advertising and promotions that are associated with the programs. Please see the terms of the applicable rewards program for information about opting out.

## **Social Media:**

We may from time to time use social media websites and applications (e.g., Facebook®, Twitter®, YouTube® and LinkedIn®) to interact with you and to communicate information about us and about our products and services. We may collect information from our interactions with you at such social media websites and applications, and we may use the information for the purposes and uses described in this Notice. If we disclose any terms of use at specific social media pages that we manage, you also will be subject to those terms when you interact with those pages. The owners and operators of social media websites and applications may impose their own terms of use and privacy policies with respect to the use of their websites and applications. This Notice does not govern the use, handling, and treatment of content you may post at social media websites and applications by the owners and operators of those websites and applications. You should review the terms of use and privacy policies of any social media website or application that you use to make sure you understand your rights and obligations with regard to content that you post.

## **Linked Web Sites and Their Privacy Policies:**

Wayne Bank's web site contains links to other third party web sites. Wayne Bank is not responsible for the privacy policies, practices or content of any external sites. The links are provided for customer convenience only, and users access them at their own risk. Users are encouraged, when they leave Wayne Bank's site, to read and gain an understanding of privacy statements within each and every web site that collects personally identifiable information.

## **Correction/Updating Personal Information:**

Wayne Bank always strives to keep customer information current and accurate. Any and all incorrect or incomplete customer data should be reported to the

bank's customer service by visiting a local community office or calling (800) 598-5002. In addition, customers are asked to notify the bank whenever personally identifiable information changes (such as a residence or e-mail address).

## Notification of Changes:

We may change our privacy practices and amend this Policy at our discretion. Any changes or amendments we make will be effective when we post them at the applicable Site, unless we expressly provide a different effective date. You agree that the posting of such changes or amendments at the applicable Site shall constitute effective notice thereof to you. You agree to review the Policy periodically to ensure that you are familiar with the current terms of this Policy. You acknowledge and agree that any changes we make are binding on you as of the effective date we dictate, but in any event your use of the applicable Site on or after the effective date constitutes your affirmative acceptance of such changes. The effective date set forth at the beginning of this Policy indicates when this Policy was last changed.

If our changes or amendments to this Policy are material, Wayne Bank will notify you in accordance with applicable law. Users opposed to the changes will have the opportunity to opt out prior to implementation of the announced changes.

## Legal Disclaimer

Wayne Bank will disclose personal information when required by law or in the good-faith belief that such action is necessary to conform to the edicts of the law or to comply with a legal process served on its Web site. In addition, the bank will share information with regulatory and law enforcement officials; provide information to protect against fraud; report account activity to credit bureaus; share information as directed by customers in writing and transfer account data to paid service providers, such as check and statement printers.

## Customer's Right to Ask Questions or Register Complaints About these Privacy Principles



Wayne Bank recognizes and respects customer privacy expectations and wants its customers to understand its commitment to privacy. As a result of the bank's commitment, these privacy principles are made available to any and all customers. Customers who have questions about this notice or have a question about the privacy of their personal information should call the Wayne Bank Compliance Officer at (800) 598-5002.

Wayne Bank takes your privacy seriously and protects your personal information from unauthorized access and use. We use security measures that comply with federal law.

[Click here](#) for our current Privacy Notice

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**Get our mobile app**

**Get our mobile  
business app**

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## Contact Information


### Corporate Headquarters

717 Main Street  
Honesdale, PA 18431  
**(800) 598-5002**  
Fax (570) 253-3725



**Translate**

## Help & Support

Employment  
About Us  
Lost or Stolen Card  
Electronic Banking FAQs  
Education and  
Awareness  
Forms  
Alerts  
Disclosures 



NMLS # 462082

Routing # 031308548

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